

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: CENTURYLINK SALES
PRACTICES AND SECURITIES
LITIGATION

MDL No. 17-2795 (MJD/KMM)

This Document Relates to:
Civil File No. 18-296 (MJD/KMM)

**LOCAL RULE 7.1 MEET-AND-CONFER STATEMENT REGARDING
PLAINTIFFS' MOTION TO COMPEL DISCOVERY**

I, Michael D. Blatchley, counsel for Lead Plaintiff the State of Oregon by and through the Oregon State Treasurer and the Oregon Public Employee Retirement Board, on behalf of the Oregon Public Employee Retirement Fund and named plaintiff Fernando Alberto Vildosola, as trustee for the AUFV Trust U/A/D 02/19/2009, certify that I met and conferred with counsel for Defendants Patrick E. Gibbs, Sarah M. Lightdale, Ryan E. Blair, Lauren G. Lee, Bryan Koch, and Christopher L. Martin concerning Plaintiffs' Motion to Compel ("Motion"). Specifically, the parties met and conferred telephonically on October 10, 2019, November 4, 2019, November 8, 2019, December 17, 2019, January 8, 2020, and February 20, 2020 concerning issues raised in the Motion. In addition, the parties exchanged written correspondence concerning the subjects at issue in the Motion, including the correspondence attached as exhibits to the concurrently-filed Declaration of Michael D. Blatchley.

As a result of the meet-and-confer process, the parties were able to resolve some issues, but were unable to agree on the issues that are the subject of Plaintiffs' present Motion.

Dated: February 25, 2020

Respectfully submitted,

/s/ Michael D. Blatchley

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